

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
Marshall Division**

ASSOCIATED RECOVERY, LLC,)
)
 Plaintiff,) Case No. 2:16-cv-00126-JRG-RSP
)
 v.)
)
 LINDA BUTCHER *et al.*,)
)
 Defendants.)
 _____)

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE
AS TO DEFENDANT FUJIFILM NORTH AMERICA CORPORATION**

Comes now the Plaintiff Associated Recovery, LLC (“Plaintiff”), by its counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) files this voluntary dismissal with prejudice as to Defendant FUJIFILM North America Corporation, a New York corporation, with a place of business at 200 Summit Lake Drive, Valhalla, New York 10595 (“Defendant FujiFilm”), stating as follows:

1. Plaintiff filed a lawsuit in the United States District Court for the Eastern District of Texas, No. 2:16-cv-00126-JRG-RSP, seeking to recover several domain names. Defendant FujiFilm is one of the defendants in this case.
2. The Amended Complaint in this case (Dkt. 15) identifies Defendant FujiFilm as being a Colorado entity, with an address of 200 Summit Lake Drive, Valhalla, New York, 10595. The Plaintiff notes that the identification of Defendant FujiFilm as a Colorado entity is an error. Defendant FujiFilm is a New York corporation, with a place of business at 200 Summit Lake Drive, Valhalla, New York 10595.

3. Defendant FujiFilm has not served either an answer or a motion for summary judgment in this case.

4. The Plaintiff and Defendant FujiFilm have entered into a settlement agreement which resolves the differences with respect to all matters in dispute before this Court.

5. Each Party will bear its own attorney's fees and costs in this case.

Based on the above, the Plaintiff hereby voluntarily dismisses this action pursuant to FED. R. CIV. P. 41(a)(1)(i) with prejudice as to Defendant FUJIFILM North America Corporation.

Respectfully submitted,

/s/ Luiz Felipe Oliveira
Luiz Felipe Oliveira (Reg. No. 5349923)
Paul Grandinetti
Rebecca J. Stempien Coyle
LEVY & GRANDINETTI
1120 Connecticut Avenue, N.W., Suite 304
Washington, D.C. 20036
Telephone (202) 429-4560
Facsimile (202) 429-4564
mail@levygrandinetti.com

Attorneys for the Plaintiff